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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CASEY BLOTZER, on behalf of himself and ) Case No. Case 8:15-cv-01011-SJO-PLA  
all others similarly situated, )  
Plaintiff, ) [Hon. S. James Otero]  
vs. )  
AMERICAN EXPRESS COMPANY )  
Defendant. )

**NOTICE OF SETTLEMENT**

NOW COMES THE PLAINTIFF by and through her attorney to respectfully notify this Honorable Court that this case has settled.

In making a determination to resolve this matter, Plaintiff and her counsel of record carefully weighed the fact that another nationwide putative class action brought pursuant to the TCPA, was already filed and is being actively litigated against the same defendant. See *Ossola v American Express Company*, Case No. 1:13-cv-04836 (filed 07/03/13 in the United States District Court Northern District of Illinois). The class definition in the *Ossola* matter appears to overlap with Plaintiff's class definition:

1 All persons who, on or after July 3, 2009, defendant called a cell phone  
2 number using predictive dialing equipment and/or a prerecorded or  
3 artificial voice where defendant did not obtain the phone number  
4 called from the called party, with respect to the subject matter of the  
5 alleged debt being collected (for example, where the number was  
6 obtained through skip tracing or captured by the defendant's  
7 equipment from an inbound call, or defendant was calling a wrong  
8 number).

9 Plaintiff's resolution of her individual matter will in no way prejudice  
10 putative class members, whose claims are being actively litigated by Plaintiff  
11 Ossola and her counsel of record.

12 Plaintiff requests that this Honorable Court vacate all pending hearing dates  
13 and allow sixty (60) days with which to file dispositive documentation. A Joint  
14 Stipulation of Dismissal will be forthcoming. This Court shall retain jurisdiction  
15 over this matter until fully resolved.

16 Respectfully submitted this 15<sup>th</sup> day of October, 2015.

17 By: s/Todd M. Friedman

18 TODD M. FRIEDMAN

19 Law Offices of Todd M. Friedman, P.C.

20 Attorney for Plaintiff

1                   **CERTIFICATE OF SERVICE**

2 Filed electronically on this 15<sup>th</sup> day of October, 2015, with:

3                   United States District Court CM/ECF system

5 Notification sent electronically on this 15<sup>th</sup> day of October, 2015, to:

6                   Honorable Judge S. James Otero  
7                   United States District Court  
8                   Central District of California

9                   Marcos D. Sasso  
10                  Strook & Strook & Lavan LLP

12                  s/Adrian R. Bacon  
13                  Adrian R. Bacon